

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

City of Chicago;

City and County of Denver; and

Pima County;

*Plaintiffs,*

vs.

United States Department of Homeland Security;

Kristi Noem, in her official capacity as Secretary of the Department of Homeland Security;

United States Federal Emergency Management Agency;

David Robinson, in his official capacity as Acting Administrator of the Federal Emergency Management Agency;

*Defendants.*

Case No. 25-cv-5463

Hon. Matthew J. Kennelly

**UNOPPOSED MOTION FOR LEAVE TO FILE EXCESS PAGES**

Plaintiffs, through undersigned counsel, hereby move for leave to file a memorandum in support of their motion for preliminary injunction of up to 30 pages, and in support state as follows:

1. Plaintiffs filed their complaint on May 16, 2025, Plaintiffs' complaint brings six claims, alleging that Defendants' actions to eliminate the Shelter and Services Program violated the U.S. Constitution, the Administrative Procedure Act, as well as other federal statutes and applicable federal regulations.

2. Local Rule 7.1 restricts the length of a brief in support of a motion to 15 pages

without leave of court.

3. Due to the complexity of the issues raised in the motion, Plaintiffs request leave to file a brief in support of their motion for preliminary injunction in excess of 15 pages.

4. Plaintiffs previously represented to the Court that they would file the motion for preliminary injunction on June 16, 2025. Plaintiffs now intend to file that motion on or before June 20, 2025. Plaintiffs defer to the Court as to whether the telephonic status conference currently set for June 18 should be deferred until after Plaintiffs' motion is on file.

5. Defendants' counsel does not object to this motion.

WHEREFORE, Plaintiffs request that the Court permit Plaintiffs to file a memorandum in support of their motion for preliminary injunction of up to 30 pages.

Dated: June 12, 2025

Respectfully submitted,

Mary B. Richardson-Lowry  
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City of Chicago

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